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August 12, 2020

The Honorable Judge Margo K. Brodie
United States District Court for the
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: 1:20-cv-02205-MKB-RER - Pre-Motion Conference Request

Dear Judge Brodie:

Pursuant to Section 3.A. of your Individual Practices and Rules, Defendants Ralf Weigel and GTE GmbH write to request a pre-motion conference concerning a motion they wish to make pursuant to Fed. R. Civ. P. 12(b)(2), 12(b)(4) and 12(b)(5) challenging personal jurisdiction and service of process. A copy of the Notice of Motion and Memorandum of Law and Declaration of Ralf Weigel in support thereof that Defendants wish to file are attached hereto as Exhibits 1, 2 and 3, respectively.

The issues raised in Defendants' motion are not new and have previously been raised and discussed before your Honor in connection with the July 29, 2020 Preliminary Injunction hearing. *See, e.g.*, Dkt. 12 at Section III.A. Accordingly, although Defendants recognize the requirement for making this request pursuant to your Individual Practices and Rules, Defendants respectfully submit that another pre-motion conference likely "will not be a useful expenditure of the parties' time" given that we have already conferred with Plaintiff's counsel concerning the service issue and have been advised that Plaintiff contends service was proper. *Id.*

Respectfully submitted,

/s/ Karl Geercken

Karl Geercken
KG:nm

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